



*State of New Jersey*  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
25 MARKET STREET  
PO Box 112  
TRENTON, NJ 08625-0112

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

MATTHEW J. PLATKIN  
*Attorney General*

MICHAEL T.G. LONG  
*Director*

March 3, 2023

**Via ECF Only**

The Honorable Lois H. Goodman, U.S.M.J.  
Clarkson S. Fisher Fedl. Bldg. & U.S. Cthse.  
Room 7050  
402 E. State Street  
Trenton, NJ 08608

Re: Kyhallista Johnson v. State of New Jersey, at al.  
Docket No.: 3:18-cv-11299-GC-LHG

Dear Judge Goodman:

This office represents the State Defendants, the State of New Jersey, the New Jersey Department of Law and Public Safety, Division of State Police, and John T. Nichols, in the above-referenced matter. Pending before the Court is Plaintiff's Motion to Amend the Complaint, returnable March 20, 2023. Defendants' opposition is currently due on March 6, 2023.

For the reasons which follow, the State Defendants respectfully request an adjournment of the return date of the Motion to April 3, 2023. Plaintiff has consented to this adjournment request. Counsel for Co-Defendants City of Long Branch and Brian O'Gibney have advised us that they shall also request an adjournment, and will do so separately in writing.

My co-counsel and I were recently assigned this case, and have been working diligently to acquaint ourselves with the facts and law. The proposed second amended complaint contains additional claims that were not previously asserted during the discovery period. We request additional time to review the evidence generated to date in discovery and to research the law so that we may adequately respond to the motion. If the adjournment request



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is granted, the State Defendants will file their opposition on or before March 20.

Enclosed is a proposed order. Thank you for your time and consideration.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Katherine Ellen Chrisman  
Katherine Ellen Chrisman  
Deputy Attorney General

Enc.

c: All Counsel of Record (via ECF)